

Message

From: Moncavage, Carissa [Moncavage.Carissa@epa.gov]
Sent: 9/26/2016 1:22:46 PM
To: Anthony E. Hummel (Anthony.Hummel@state.de.us) [Anthony.Hummel@state.de.us]
CC: bryan.ashby@state.de.us; Trulear, Brian [Trulear.Brian@epa.gov]; Hales, Dana [Hales.Dana@epa.gov]
Subject: Port Penn STP (DE0021539)

Tony,

According to our Memorandum of Agreement, the Environmental Protection Agency (EPA) Region III has received the draft National Pollutant Discharge Elimination System (NPDES) permit for:

Port Penn Sanitary Treatment Plant

NPDES Number: DE0021539

EPA Received: August 31, 2016

This is a minor permit that discharges to the Delaware River and is affected by the Delaware River PCB TMDL. Therefore, EPA has chosen to perform a limited review based on the wasteload allocation requirements of the approved Delaware River PCB TMDL. I have completed my review and offer the following comments:

1. Special condition 8.c. provides instructions, including a timeline and other requirements, for submitting a Pollutant Minimization Plan (PMP) while special condition 8.d. discusses PMP annual report instructions. However, there is no indication as to when the annual report should be submitted. Since the annual report is to be submitted beginning one year from the date of commencement of the PMP implementation, it is recommended this language be included in the permit. Below is a recommendation of language that should be included in the permit:

Submit an Annual Report beginning one year from the date of commencement of the PMP to the DRBC and the Department consistent with the guidance specified at <http://www.state.nj.us/drbc/programs/quality/pmp.html>

2. The effluent limit table found in part B.1. of the permit references special conditions nos. 8 and 9 for PCBs. The reference to special condition no. 9 appears to be a carryover from the previous permit, please verify and remove.

Please address the above and provide me with any changes to the draft permit and/or fact sheet, if necessary.

Carissa Moncavage

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